

## Cope, Ben

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**From:** Labiosa, Rochelle  
**Sent:** Friday, June 16, 2017 9:10 AM  
**To:** Mann, Laurie; Zell, Christopher; Cope, Ben; Bonifacino, Gina  
**Cc:** Wilcox, Michelle  
**Subject:** RE: Draft PPA language on Puget Sound nutrients

My main comment (after discussing with Angela), is that a commenter highlighted the last three bulleted actions in the table to be folded into the next cycle (starting 2019), and I believe the first bullet of the three should be included in this cycle (2017-2019). ECY should have the WQS in mind while they develop the plan and actions, so that there is not a mismatch at the end of developing the plan. For example, on the page 28 blurb, it speaks to a list of actions to meet “targets”, but if a crosswalk with WQS happens after that, there will be a delay in reconfiguring the plan and any actions that follow at best, and at worst, there will be buy-in for a set of actions that do not meet regulatory targets. So my recommendation would be to include it in this year’s PPA.

One other thing to keep in mind, is that there are some wide-scale ecological changes related to nutrient dynamics (See Krembs et al work – likely due to denitrification/nitrification and other cycling, and/or changing thermal and light regimes impacting the microbiology) that may not be captured in the model or in current studies. I am hoping that there can be included more study/research on the mechanism driving the wide-scale ecological changes. Relying only on the model may not result in resolving these broader scale issues, such that there may be questions in the end (after planning and implementation) about why there are still ecological changes occurring or expected to occur, and it would be great to have some answers re the mechanisms.

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**From:** Mann, Laurie  
**Sent:** Thursday, June 15, 2017 4:10 PM  
**To:** Labiosa, Rochelle <labiosa.rochelle@epa.gov>; Zell, Christopher <zell.christopher@epa.gov>; Cope, Ben <Cope.Ben@epa.gov>; Bonifacino, Gina <Bonifacino.Gina@epa.gov>  
**Cc:** Wilcox, Michelle <wilcox.michelle@epa.gov>  
**Subject:** FW: Draft PPA language on Puget Sound nutrients

Rochelle, Chris & Ben & Gina:  
Michelle Wilcox is coordinating all the “back and forth” between Ecology and EPA on the Washington PPA. Ecology proposed a new subsection that addresses Puget Sound Nutrients. Do any of you have any comments on the proposed language in the attachment?

(Michelle – there is no obvious “lead” on this particular PPA item at EPA, so I’m forwarding it to the folks who I suspect are most connected to this issue).  
Laurie

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**From:** Wilcox, Michelle  
**Sent:** Thursday, June 15, 2017 3:47 PM

**To:** Mann, Laurie <[mann.laurie@epa.gov](mailto:mann.laurie@epa.gov)>

**Subject:** FW: Draft PPA language on Puget Sound nutrients

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**From:** Levitt, Eli (ECY) [<mailto:elev461@ECY.WA.GOV>]

**Sent:** Thursday, June 15, 2017 3:44 PM

**To:** Wilcox, Michelle <[wilcox.michelle@epa.gov](mailto:wilcox.michelle@epa.gov)>

**Subject:** Draft PPA language on Puget Sound nutrients

Hi Michelle,

Here is our proposal for the Puget Sound nutrient language.

Eli